

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
SOUTHERN DIVISION**

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<b>In Re:</b>	)	
	)	
<b>DENNIS JEREMY CRUMLEY</b>	)	<b>Case No. 1:08-bk-14582</b>
<b>MICHA ELIZABETH CRUMLEY,</b>	)	<b>Chapter 13</b>
	)	
<b>Debtors.</b>	)	
	)	
<b>DENNIS JEREMY CRUMLEY,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Adv. Pro. No. 1:14-ap-01049</b>
	)	
<b>HSBC RETAIL CREDIT (USA) INC.</b>	)	
<b>(KAWASAKI)</b>	)	
<b>and</b>	)	
<b>ECAST SETTLEMENT CORPORATION,</b>	)	
	)	
<b>Defendants.</b>		

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**MOTION FOR ENTRY OF AGREED ORDER GRANTING EXTENSION OF TIME TO  
RESPOND TO PLAINTIFF’S “OBJECTION TO CLAIM NO. 26 OF HSBC RETAIL  
CREDIT (USA) INC. (KAWASAKI) COMBINED WITH ADVERSARY PROCEEDING  
SEEKING TURNOVER OF FUNDS AND COMPLAINT FOR WILLFUL VIOLATION  
OF BANKRUPTCY RULES PROTECTING PLAINTIFF’S IDENTIFIABLE  
INFORMATION”**

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COMES NOW Defendant, HSBC Retail Credit (USA) Inc. (Kawasaki), by and through counsel, and moves the Court to enter the Agreed Order Granting Extension of Time to Respond to Plaintiff’s Objection To Claim No. 26 Of HSBC Retail Credit (USA) Inc. (Kawasaki) Combined With Adversary Proceeding Seeking Turnover Of Funds And Complaint For Willful Violation Of Bankruptcy Rules Protecting Plaintiff’s Identifiable Information until August 27, 2014. A copy of the proposed order is attached hereto.

WHEREFORE, PREMISES CONSIDERED, HSBC Retail Credit (USA) Inc. (Kawasaki) respectfully requests that the Court enter the attached Agreed Order.

DATED this 6th day of August, 2014.

**BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, PC**

s/ David J. Holesinger  
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*Attorneys for Defendant HSBC Retail Credit  
(USA) Inc. (Kawasaki)*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 6, 2014, a true and correct copy of the foregoing Motion with proposed order was sent via e-mail by the automated ECF system or by mail, to the following:

Richard L. Banks, Esq.  
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s/David J. Holesinger